

Exhibit I

BakerHostetler

Baker&Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

October 13, 2023

John J. Carney
direct dial: 212.589.4255
jcarney@bakerlaw.com

VIA EMAIL: YICHIN@HOTMAIL.COM

Re: SEC v. Qin, et al., 20-CV-10849(JGLC): Reply to Investor Letter

Dear Yichen Lee:

We are counsel to Robert A. Musiala Jr., Esq., Court-appointed Receiver in the above-referenced matter. We respectfully submit this letter to acknowledge and reply to the letter from you and a group of investors (“Investor Letter”) in the Virgil Sigma Fund LP and the VQR Multistrategy Fund LP (the “Funds”) emailed to the Court on September 19, 2023. We have attached the Court’s order dated October 3, 2023,¹ directing this response and will file this response with the Court.

The Receiver is committed to completing the work required by the Order Appointing Receiver (“OAR”) and making a distribution to the claimants as soon as practicable. As of the date of this letter, the Receiver has made significant recoveries for the benefit of investors. However, significant legal action may still be required to recover millions of dollars of known outstanding funds for the benefit of the Receivership. The Receiver and Receiver team are directed by the OAR to institute such actions and legal proceedings in a reasonable and cost-effective manner.²

The Receiver team has confirmed that each of the 20 signatories to the Investor Letter has submitted a timely filed claim through the Receivership’s electronic claims portal.³ As described in the “Investor FAQs” posted to the Receivership website,⁴ the Receiver is working diligently to finish the legal and technical analysis required to complete a motion to the Court setting forth his proposed process for the determination of claims. The Receiver will seek to file such motion with the Court as soon as possible, and no later than during the first quarter of 2024. The Court will then consider and rule on the motion. Based on the Court’s decision on the motion, the Receiver will

¹ ECF No. 246, *attached herein*.

² OAR § IX.35

³ One signatory to the Investor Letter represents two timely submitted claims.

⁴ *SEC v. Qin – Investor FAQs*, Last updated October 13, 2023, *available at* <https://admin.bakerlaw.com/wp-content/uploads/2023/10/Investor-FAQ-2023-10-13.pdf>.

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communicate claim determinations to claimants. Thereafter, the Receiver will seek approval from the Court to begin the process of distributing the Receivership funds to allowed claimants.

More information on the current status of funds recovered and secured for the benefit of the claimants will be made available in the Receiver's forthcoming twelfth status report, which the Receiver expects to file with the Court on October 16, 2023.

Respectfully Submitted,

/s/ John J. Carney

John J. Carney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

-against-

STEFAN QIN, et al.,

Defendants.

20-CV-10849 (JGLC)

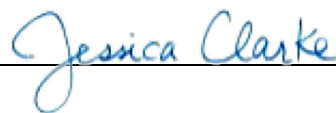
ORDER

JESSICA G. L. CLARKE, United States District Judge:

On September 19, 2023, the Court received an email from purported investors in the Virgil Sigma Fund LP and the VQR Multistrategy Fund LP. *See* Exhibit A. The Court understands that the Receiver has already engaged with some of the investors. The Receiver is hereby ORDERED to respond to the investors by email by **October 13, 2023**. The Receiver shall further append a copy of this order to that email. The Receiver shall file its email response to the investors with the Court within two business days of that email.

Dated: October 3, 2023
New York, New York

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Exhibit A

Address: 16F-2, No151, Sec4, Xinyi Road, Taipei, Taiwan
Email: yichin@hotmail.com
Phone: +886-932-304-851
Date: 09/09/2023

Honorable Jessica G. L. Clarke
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Petition and Complaint Regarding Third-Party Receiver's Delay in Fund Release - Case #1:20-cv-10849

Your Honor,

We, the undersigned investors of the Virgil Sigma Fund LP and the VQR Multistrategy Fund LP, are writing to express our deep concerns and frustrations regarding the prolonged delay in the release of funds held by the third-party receiver in the case of United States Securities and Exchange Commission v. Qin et al, Case #: 1:20-cv-10849.

Firstly, we commend your dedication to justice and the oversight of this case. We are writing to respectfully draw your attention to a matter of grave concern that has been negatively impacting all of the undersigned investors.

We understand that the Receiver, Robert A. Musiala Jr. of BakerHostetler, was appointed to oversee the assets and affairs of the entities controlled by Mr. Stefan Qin. While we appreciate the importance of a comprehensive investigation, we are alarmed by the excessive fees being charged by the third-party receiver, coupled with the protracted delay in releasing the funds back to the rightful investors.

Of particular concern is the fact that the third-party receiver has recovered a total of \$13,776,933 USD (excluding the initial amount seized by the SEC). However, it has come to our attention that a substantial portion of these funds—\$9,133,956 USD—has been spent. This discrepancy raises serious questions about the receiver's actions and decisions, especially considering the considerable financial hardship that investors like us have been enduring. It seems inherently unfair that a substantial portion of the funds that have been found have been expended without a corresponding release to the investors who have been waiting for relief.

We believe that transparency and accountability are paramount in this situation. Therefore, we respectfully request that the third-party receiver's full unblocked billing records be made publicly available for scrutiny. This will ensure that the investors are fully informed about the fees and charges being assessed, and whether they are reasonable and justified given the circumstances.

The negative impact of this delay on us, the investors, has been severe. Many of us are facing financial distress, and some are experiencing dire consequences, such as divorce, separation of children, postponement of retirement, and an inability to fund education for our children. We feel helpless and frustrated as we watch the funds we entrusted being held in limbo, while we continue to suffer.

We believe that justice should not only involve the thorough investigation of alleged wrongdoing but also the fair and timely resolution of the claims of the affected parties. We respectfully request your intervention to ensure that the third-party receiver promptly releases the funds back to the investors, and that an equitable distribution of the recovered funds is carried out.


We understand the complexity of this case and the need for a thorough review, but we believe that fairness and justice require that investors are not further victimized by unnecessary delays and excessive fees. We trust in your commitment to upholding the principles of justice and protecting the rights of all parties involved.

We kindly request that you consider the information and concerns expressed in this letter and take any appropriate action to address this matter. We believe that your intervention can play a crucial role in ensuring a just and fair resolution that respects the rights and interests of all investors.

Thank you for your attention to this pressing issue. We remain hopeful that your intervention will bring about a resolution that is both just and timely.

Sincerely,

Yichen Lee

DocuSigned by:

FB9269E37D9C4E0

List of Investors

Wei Meng

DocuSigned by:

Wei meng

Kowk Wing Chan

DocuSigned by:

Kowk Wing Chan

Long Yuet Ming

DocuSigned by:

Long Yuet Ming

Cheong Wah Yip

DocuSigned by:

Cheong Wah Yip

Louis Choy

DocuSigned by:

Louis Choy

Crystal Chen

DocuSigned by:

Crystal Chen

Benedict Tse

DocuSigned by:

Benedict Tse

Chee Yang

DocuSigned by:

Chee Yang

Qing Ge Ji Fu

DocuSigned by:

Qing Ge Ji Fu

Yue Guo

DocuSigned by:

Yue Guo

Jonathan Lau

DocuSigned by:

Jonathan Lau

Ziqian Jia

DocuSigned by:

Ziqian Jia

Ying Liu

DocuSigned by:

Ying Liu

Tenghe Hu

DocuSigned by:

Tenghe Hu

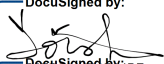
Doris Ho

Johnson Chow

Marselle Ma

William J Weathers II

Mark Gorton

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Marselle Ma
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